

Sheldrake, Sean

From: Sheldrake, Sean
Sent: Monday, September 09, 2013 11:25 AM
To: 'Ryan Barth'
Cc: 'PetersonLE@cdm.com'; Bob Wyatt; Patty Dost; Carl Stivers; Ben Hung; James Peale; 'agladstone@davisrothwell.com' (agladstone@davisrothwell.com); myron.burr@siltronic.com; Alanna Conley (Conley.Alanna@epa.gov); Alex Liverman (liverman.alex@deq.state.or.us); Audie Huber (audiehuber@ctuir.com); Brandy Humphreys (Brandy.Humphreys@grandronde.org); Brian Cunnighame (cunnighame@gorge.net); Chip Humphrey (humphrey.chip@epamail.epa.gov); cora.iori@epa.gov; Dan Hafley (HAFLEY.Dan@deq.state.or.us); Dana Bayuk (bayuk.dana@deq.state.or.us); Erin Madden (erin.madden@gmail.com); Gail Fricano (gfricano@indecon.com); Genevieve Angle (Genevieve.Angle@noaa.gov); JD Williams (jd@williamsjohnsonlaw.com); Jen Kassakian (jkassakian@indecon.com); Jennifer Peterson (peterson.jennifer@deq.state.or.us); Jeremy Buck (jeremy_buck@fws.gov); Jim Anderson (ANDERSON.Jim@deq.state.or.us); Julie Weis (jweis@hk-law.com); Keith Johnson (johnson.keith@deq.state.or.us); Kristin Callahan; Kristine Koch (koch.kristine@epa.gov); Lance Peterson (PetersonLE@cdmsmith.com); Mark Ader (ader.mark@epa.gov); Matt Johnson (matt@williamsjohnsonlaw.com); Matt McClincy (mcclincy.matt@deq.state.or.us); McClure Tosch (tosm@yakamafish-nsn.gov); Michael Karnosh (Michael.Karnosh@grandronde.org); Mike Poulsen (poulsen.mike@deq.state.or.us); Muza, Richard; Nancy Munn (Nancy.Munn@noaa.gov); Rachel DelVecchio (rdelvecchio@indecon.com); Rob Neely (Robert.Neely@noaa.gov); Rose Longoria (rose@yakamafish-nsn.gov); schwarz.bob@deq.state.or.us (schwarz.bob@deq.state.or.us); Ted Buerger (ted_buerger@fws.gov); Tom Downey (tomd@ctsi.nsn.us); Tom Gainer (gainer.tom@deq.state.or.us)
Subject: RE: Gasco Sediments Site US Moorings Sediment Characterization Work Plan - Response to EPA Conditional Approval
Attachments: NWN Siltronic 9 9 13.pdf

Hi Ryan, Myron, and Bob,

Please see EPA's attached response letter. Let me know if you have any questions.

Thank you.

S

Sean Sheldrake, Unit Diving Officer, RPM
EPA Region 10, 1200 Sixth Ave., Suite 900
Seattle, WA 98101
206.553.1220 desk
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<http://yosemite.epa.gov/r10/cleanup.nsf/sites/ptldharbor>
<http://www.epa.gov/region10/dive/>

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From: Ryan Barth [mailto:rbarth@anchorqea.com]
Sent: Thursday, September 05, 2013 3:14 PM
To: Sheldrake, Sean
Cc: 'PetersonLE@cdm.com'; Bob Wyatt; Patty Dost; Carl Stivers; Ben Hung; James Peale; 'agladstone@davisrothwell.com' (agladstone@davisrothwell.com); myron.burr@siltronic.com
Subject: Gasco Sediments Site US Moorings Sediment Characterization Work Plan - Response to EPA Conditional Approval

Attached please find NW Natural's and Siltronic's responses to your conditional approval letter provided in your below email. Please let me know if you have any questions. Thanks.

Ryan Barth, P.E.
Anchor QEA, LLC
rbarth@anchorage.com
720 Olive Way, Suite 1900
Seattle, Washington 98101
Office: 206.287.9130
Direct: 206.903.3334
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Cell: 206.719.3605

From: Sheldrake, Sean [<mailto:sheldrake.sean@epa.gov>]
Sent: Thursday, August 15, 2013 2:56 PM
To: Ryan Barth
Cc: Peterson, Lance; Carl Stivers; Bob Wyatt; Patty Dost; Ben Hung; James Peale; WEARLE@davisrothwell.com; 'agladstone@davisrothwell.com'; myron.burr@siltronic.com; Joy Dunay; Chris Budai (Christine.M.Budai@usace.army.mil); Conley, Alanna; Alex Liverman (liverman.alex@deq.state.or.us); Audie Huber (audiehuber@ctuir.com); brandy.humphreys@grandronde.org; Brian Cunningham (cunninghame@gorge.net); Humphrey, Chip; Colin Wagoner (colin@ridolfi.com); Cora, Lori; Dan Hafley; Dana Bayuk; Erin Madden (erin.madden@gmail.com); Gail Fricano (gfricano@indecon.com); Genevieve Angle (Genevieve.Angle@noaa.gov); JD Williams (jd@williamsjohnsonlaw.com); Jen Kassakian (jkassakian@indecon.com); peterson.Jennifer@deq.state.or.us; Jeremy.Buck@fws.gov; Jim Anderson (ANDERSON.Jim@deq.state.or.us); Julie Weis (jweis@hk-law.com); Keith Johnson (johnson.keith@deq.state.or.us); Kristin Callahan; Koch, Kristine; Ader, Mark; Matt Johnson (matt@williamsjohnsonlaw.com); Matt McClincy (mcclincy.matt@deq.state.or.us); tosm@yakamafish-nsn.gov; Michael.karnosh@grandronde.org; poulsen.mike@deq.state.or.us; Muza, Richard; Nancy Munn (Nancy.Munn@noaa.gov); Rachel DelVecchio (rdelvecchio@indecon.com); Robert.Neely@noaa.gov; rose@yakamafish-nsn.gov; schwarz.bob@deq.state.or.us; Ted Buerger (ted_buerger@fws.gov); tomd@ctsi.nsn.us; Tom Gainer (gainer.tom@deq.state.or.us)
Subject: RE: Gasco Sediments Site US Moorings Sediment Characterization Work Plan

Hello Ryan, Bob, and Myron,

Please see the attached letter with conditional approval for the subject workplan for completion of work this field season. Let me know if I can answer any questions.

Thank you.

S

Sean Sheldrake, Unit Diving Officer, RPM
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<http://yosemite.epa.gov/r10/cleanup.nsf/sites/ptldharbor>
<http://www.epa.gov/region10/dive/>

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From: Ryan Barth [<mailto:rbarth@anchorage.com>]
Sent: Thursday, July 18, 2013 5:06 PM
To: Sheldrake, Sean
Cc: Peterson, Lance; Carl Stivers; Bob Wyatt; Patty Dost; Ben Hung; James Peale; WEARLE@davisrothwell.com;

'agladstone@davisrothwell.com'; myron.burr@siltronic.com; Joy Dunay

Subject: Gasco Sediments Site US Moorings Sediment Characterization Work Plan

Sean –

Attached please a copy of the subject document per Option 2 in your May 22, 2013 letter.

Prior to performing the field sampling, NW Natural would like to coordinate a meeting with the EPA field oversight personnel to collectively discuss and review the definition of substantial product and examples of representative cores with and without substantial product. This will help facilitate consensus on the presence/absence of substantial product during the field logging process. Please let me know who to contact to schedule this meeting.

Regards.

From: Sheldrake, Sean [<mailto:sheldrake.sean@epa.gov>]

Sent: Wednesday, May 22, 2013 2:43 PM

To: Ryan Barth

Cc: Peterson, Lance; Carl Stivers; Bob Wyatt; Patty Dost; Ben Hung; James Peale; WEARLE@davisrothwell.com;

'agladstone@davisrothwell.com'; myron.burr@siltronic.com; Dana Bayuk; Humphrey, Chip; Koch, Kristine

Subject: RE: NW Natural Response to EPA Letter on US Moorings Sediments Area, Gasco Sediments Site

Ryan, Bob,

Please see EPA's letter to respond to your May 15 transmittal. Let me know if you have any questions.

Thank you.

S

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<http://www.epa.gov/region10/dive/>

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From: Ryan Barth [<mailto:rbarth@anchorgea.com>]

Sent: Wednesday, May 15, 2013 4:47 PM

To: Sheldrake, Sean

Cc: Peterson, Lance; Carl Stivers; Bob Wyatt; Patty Dost; Ben Hung; James Peale; WEARLE@davisrothwell.com;

'agladstone@davisrothwell.com'; myron.burr@siltronic.com

Subject: NW Natural Response to EPA Letter on US Moorings Sediments Area, Gasco Sediments Site

On behalf of NW Natural, attached please find a technical analysis of the US Moorings sediments area issue per your request in item 1 below. Thanks.

Ryan Barth, P.E.

Anchor QEA, LLC

rbarth@anchorgea.com

720 Olive Way, Suite 1900

Seattle, Washington 98101

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Cell: 206.719.3605

From: Sheldrake, Sean [<mailto:sheldrake.sean@epa.gov>]
Sent: Friday, May 10, 2013 4:33 PM
To: Bob Wyatt
Cc: Ryan Barth; Carl Stivers; Peterson, Lance; Dana Bayuk
Subject: RE: Gasco Sediments Site

Bob,

This email serves as a schedule extension to the 30 day workplan requirement, as noted below. However, I do need to point out that the dispute timeframe has past for the EPA requirement of modification of the draft ee/ca removal action area for further ee/ca consideration (next revision) or alternatively, obtaining additional samples (see attached). EPA is amenable to looking at alternate schedule proposals from NWN as well as new information of course as you've suggested below. Accordingly, I've noted that dispute of a workplan timeframe can be held until after the meeting to ensure adequate time is given for development of a plan, but not the substance of what is set out in the November 29, 2012 letter for which the dispute timeframe has already passed.

Revised schedule:

1. NW Natural submits a technical analysis of the issue by next Friday (May 17th, 2013).
2. Within 30 days of that date NW Natural will meet with EPA to discuss the evaluation and to determine if EPA still believes additional samples may be necessary. EPA will extend the deadline for initiating dispute resolution concerning the work plan **deadline** until 7 days after the meeting.
3. A workplan to fulfill requirements of the November 29, 2012 letter is due 90 days from today's date, unless otherwise approved by EPA.

Please let me know if you have any questions.

Thank you.

S

Sean Sheldrake, Unit Diving Officer, RPM
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<http://www.epa.gov/region10/dive/>

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From: Wyatt, Robert [<mailto:rjw@nwnatural.com>]
Sent: Friday, May 10, 2013 4:05 PM
To: Sheldrake, Sean

Cc: Ryan Barth; Carl Stivers
Subject: Gasco Sediments Site

Hi Sean,

It was great talking with you this afternoon. As we discussed, NW Natural would like to revise the schedule for responding to your May 1st, 2013 request for a work plan. My proposal for revising the schedule is as follows:

1. NW Natural submits a technical analysis of the issue by next Friday (May 17th, 2013).
2. Within 45 days of that date NW Natural will meet with EPA to discuss the evaluation and to determine if EPA still believes additional samples may be necessary. EPA will extend the deadline for initiating dispute resolution concerning the work plan request until 7 days after the meeting.
3. If sampling is not required we would not develop a sampling plan.
4. If EPA still believes that sampling is necessary we would evaluate data needs, data use and data quality objectives to be used in the development of a work plan. The schedule for work plan development would be produced at that time.

I agree with your goal of having a clear project timeline, and I appreciate your willingness to consider this revised schedule approach.

I hope you have a great weekend,

Bob